

1 HEATHER E. WILLIAMS, CA Bar #122664
2 Federal Defender
3 LAURA MYERS, IL Bar #6338417
4 Assistant Federal Defender
5 Office of the Federal Defender
6 2300 Tulare Street, Suite 330
7 Fresno, CA 93721-2226
8 Telephone: (559) 487-5561
9 Fax: (559) 487-5950

10 Attorneys for Defendant
11 JAMAIYAH D. LYLES

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 JAMAIYAH D. LYLES,
18 Defendant.

19 Case No. 5:22-po-00184-CDB
20 MOTION FOR ORDER AUTHORIZING
21 VIDEO APPEARANCE; [PROPOSED] ORDER
22 Date: February 6, 2024
23 Time: 10:00 a.m.
24 Judge: Hon. Christopher D. Baker

25 Defendant Jamaiyah D. Lyles hereby moves this Court for an order authorizing her to
26 appear via video at the federal court in Houston for the February 6, 2024 change of plea hearing.

27 On June 26, 2022, Ms. Lyles received two citations—one for driving without a license in
28 violation of 18 U.S.C. § 13 (incorporating California Vehicle Code 12500(a)) and one for
speeding in violation of 18 U.S.C. § 13 (incorporating California Vehicle Code 22349(b)).

29 On October 3, 2023, this Court granted Ms. Lyles's request to plead guilty at the federal
30 court in Houston. The change-of-plea hearing was initially set for November 7, 2023, but was
31 later continued to December 5, 2023. Ms. Lyles did not appear for the change-of-plea hearing on
32 December 5, 2023. Counsel contacted the court on her behalf to place her back on the calendar,
33 and her next appearance is scheduled for February 6, 2024.

34 Ms. Lyles apologizes to the Court for her failure to appear. The prior week, she had
35 traveled to El Paso with her infant daughter, with the intention to return to her home near

1 Houston before the hearing. Unfortunately, while in El Paso, Ms. Lyles's daughter became ill,
2 with a cough that kept her from sleeping. Ms. Lyles decided to delay her return trip, rather than
3 take her daughter on public transportation while she was sick. In her concern for her daughter's
4 health, the court date slipped her mind. She regrets this mistake.

The defense now moves this Court for an order authorizing Ms. Lyles to appear via video at the February 6, 2024 hearing. Ms. Lyles currently lives in Humble, Texas—approximately 1,675.8 miles from Bakersfield, California. Ms. Lyles, a single mother, does not have the financial means to travel to Bakersfield.

If this Court does not grant Ms. Lyles's motion to appear via video, Ms. Lyles requests a one-month continuance, to March 5, 2024, to allow time for counsel to move for financial assistance for her travel.

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Respectfully submitted,

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Date: January 16, 2024

/s/ *Laura Myers*

LAURA MYERS

Assistant Federal Defender

Attorney for Defendant

JAMAIYAH D. LYLES

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ORDER

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IT IS SO ORDERED.

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Dated: **January 16, 2024**

Chris D. Brown
UNITED STATES MAGISTRATE JUDGE